Subject: Opposition to FCC Public Notice August 2024 – Proposal by NextNav

From: Drumlins Amateur Radio Club

Date: August 31, 2024

Proceeding: 24-240

Like many in the Amateur Radio community, we are concerned about the recent NextNav petition to seek usage of the 902-928 MHz band (33cm band). A number of Hams within our club utilize this band space for experimentation and communication. Without question, there are a large number of clubs and club members across the country that utilize this band space.

The 33cm band experimentation is a great example of the purpose of Amateur Radio as defined by Part 97.1 whereby Amateurs have advanced the art of radio by finding new “off label” uses for equipment and also have given many Amateur Radio operators experience with Part 90 equipment and learning how to use, configure and troubleshoot them as well.

The 900 MHz band is a critical piece of spectrum used for various applications, including industrial, scientific, and medical purposes, as well as Amateur Radio. It’s a unique band that supports a wide array of technologies, from garage door openers, cordless phones, and baby monitors to more advanced uses like Meshtastic’s decentralized communication networks.

Our club relies on 900mhz to bring Internet services to our multiple repeaters that link for R.A.C.E.S operations and public services. The distance and terrain in upstate NY doesn’t allow us to run on other frequencies. The 2.4ghz internet has been swamped with so many users and 900mhz is the only avenue for us. We rely on this system as for nuclear drill emergencies that are tied into the repeater system.

It is my belief that NextNav should develop a system that doesn’t require so much bandwidth. The present GPS systems do not use 26mhz of spectrum to do GPS location services. So many services would be displaced and disrupted by granting this proposal. Additionally, we have seen where companies are allocated spectrum like the 220mhz band with the United Parcel Service that took 2mhz of spectrum and they never built out there system.

I hope the FCC does a valid interference study as many licensed and unlicensed users are using this band.